DENNIS A. BARLOW, CITY ATTORNEY State Bar No. 63849 2 CAROL A. HUMISTON, SR. ASST. CITY ATTY State Bar No. 115992 37 S East Oftwe Avenue P. O. Box 6459 Burbank, C. 491510 Tel: 818-238-5707 Fax: 818-238-5724 Kristin A. Pelletier, (Sbw 155378) E-mail: kpelletier(Sbwslaw.com Robert J. 1yson (SBN 187311) Tel: mail: ryson (SBN 187311) Tel: 218-235-5000 Fax: 213-236-2700 Attorneys for Defendant City of Burbank SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF LOS ANGELES - CENTRAL DISTRICT CHRISTOPHER LEE DUNN Plaintiff, SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF LOS ANGELES - CENTRAL DISTRICT CHRISTOPHER LEE DUNN Plaintiff, SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF LOS ANGELES - CENTRAL DISTRICT CHRISTOPHER LEE DUNN Plaintiff, SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF LOS ANGELES - CENTRAL DISTRICT CHRISTOPHER LEE DUNN Plaintiff, SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF LOS ANGELES - CENTRAL DISTRICT CHRISTOPHER LEE DUNN Plaintiff, Assigned to the Honorable Alan S. Rosenfield, Dept. 31 Complaint filed: July 16, 2009 [PROPOSED] ORDER GRANTING MOTION: (1) TO COMPLE FURTHER RESPONSES TO SPECIAL AND FORM INTERROGATORIES AND (2) FOR MONETARY SANCTIONS AGAINST PLAINTIFF AND HIS COUNSEL The motion of defendant City of Burbank for an order compelling plaintiff Christopher Lee Dunn to further respond to its first set of special interrogatories, and for monetary sanctions, came on for hearing in Department 31 of this Court on June 10, 2010, Hon. Alan S. Rosenfield, presiding. Robert J. Tyson appeared on behalf of defendant City of Burbank. Solomon E. Gresen appeared on behalf of plaintiff Christopher Lee Dunn. Lee Dunn to further respond to its first set of special interrogatories, and for monetary sanctions, came on for hearing in Department 31 of this Court on June 10, 2010, Hon. Alan S. Rosenfield, presiding. Robert J. Tyson appeared on behalf of defendant City of Burbank. Solomon E. Gresen appeared on behalf of plaintiff Christopher Lee Dunn. Lee Dunn to further respond t			
State Bar No. 115922 275 East Olive Avenue P. O. Box 6459 Burbank, CA 91510 Tel: 818-238-5707 Fax: 818-238-5724 Kristin A. Pelletier, (SBN 157378) E-mail: Tyson (SBN 187311) B-mail: Tyson (SBN 18731) B-mail: Tyson (SBN 18731		State Bar No. 63849	GOVERNMENT CODE § 6103
P. O. Box 6459 Burbank, CA 91510 Tel: 818-238-5707 Fax: 818-238-5724 Kristin A. Pelletier, (SBN 155378) B-mail: kpelletien@bwslaw.com Robert J. Tyson (SBN 18731) E-mail: rtyson@bwslaw.com BURKE, WILLIAMS & SORENSEN, LLP 444 South Flower Street, Suite 2400 Los Angeles, CA 9071-2953 Tel: 213.236.0600 Fax: 213.236.2700 Attorneys for Defendant City of Burbank COUNTY OF LOS ANGELES - CENTRAL DISTRICT CHRISTOPHER LEE DUNN Plaintiff, V. BURBANK POLICE DEPARTMENT, CITY OF BURBANK, and DOES 1 Through 100, Inclusive, Defendants. COUNTY OF LOS ANGELES - CENTRAL DISTRICT Complaint filed: July 16, 2009 [PROPOSED] ORDER GRANTING MOTION: (1) TO COMPEL FURTHER RESPONSES TO SPECIAL AND FORM INTERROGATORIES AND (2) FOR MONETARY SANCTIONS AGAINST PLAINTIFF AND HIS COUNSEL The motion of defendant City of Burbank for an order compelling plaintiff Christopher Lee Dunn to further respond to its first set of special interrogatories, and for monetary sanctions, came on for hearing in Department 31 of this Court on June 10, 2010, Hon. Alan S. Rosenfield presiding. Robert J. Tyson appeared on behalf of defendant City of Burbank. Solomon E. Gresen appeared on behalf of plaintiff Christopher Lee Dunn. LA W4823-6872-3765 v1 LA W4823-6872-3765 v1 -1-		State Bar No. 115592	
Tel: \$18-238-5707 Fax: \$18-238-5724 Kristin A. Pelletier, (SBN 155378) E-mail: tryson@bwslaw.com Robert J. Tyson (SBN 187311) B-mail: tryson@bwslaw.com BURKE, WILLIAMS & SORENSEN, LLP 444 South Flower Street, Suite 2400 Los Angeles, CA 90071-2953 Tel: 213.236.0500 Fax: 213.236.2700 Attorneys for Defendant City of Burbank CHRISTOPHER LEE DUNN BURBANK POLICE DEPARTMENT, CITY OF BURBANK, and DOES 1 Through 100, Inclusive, Defendants. Defendants. The motion of defendant City of Burbank for an order compelling plaintiff Christopher Lee Dunn to further respond to its first set of special interrogatories, and for monetary sanctions, came on for hearing in Department 31 of this Court on June 10, 2010, Hon. Alan S. Rosenfield presiding. Robert J. Tyson appeared on behalf of defendant City of Burbank. Solomon E. Gresen appeared on behalf of plaintiff Christopher Lee Dunn. LA \$44823-6872-5765 vl -1-		P. O. Box 6459	
Kristin A Pelletier, (SBN 155378) E-mail: kpelletier@bwslaw.com Robert J. Tyson (SBN 187311) E-mail: tryson@bwslaw.com BURKE, WILLIAMS & SORENSEN, LLP 444 South Flower Street, Suite 2400 Los Angeles, CA 90071-2953 Tel: 213.236.0600 Fax: 213.236.2700 Attorneys for Defendant City of Burbank SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF LOS ANGELES – CENTRAL DISTRICT CHRISTOPHER LEE DUNN Plaintiff, V. Case No. BC 417928 Assigned to the Honorable Alan S. Rosenfield, Dept. 31 Complaint filed: July 16, 2009 [PROPOSED] ORDER GRANTING MOTION: (1) TO COMPEL FURTHER RESPONSES TO SPECIAL AND FORM INTERROGATORIES AND (2) FOR MONETARY SANCTIONS AGAINST PLAINTIFF AND HIS COUNSEL The motion of defendant City of Burbank for an order compelling plaintiff Christopher Lee Dunn to further respond to its first set of special interrogatories, and for monetary sanctions, came on for hearing in Department 31 of this Court on June 10, 2010, Hon. Alan S. Rosenfield presiding. Robert J. Tyson appeared on behalf of defendant City of Burbank. Solomon E. Gresen appeared on behalf of plaintiff Christopher Lee Dunn. LA MREZI-GRAPA SORENSEN, LLP Attorneys for Defendant City of Burbank or Case No. BC 417928 Assigned to the Honorable Alan S. Rosenfield, Dept. 31 Complaint filed: July 16, 2009 [PROPOSED] ORDER GRANTING MOTION: (1) TO COMPEL FURTHER RESPONSES TO SPECIAL AND FORM INTERROGATORIES AND (2) FOR MONETARY SANCTIONS AGAINST PLAINTIFF AND HIS COUNSEL The motion of defendant City of Burbank for an order compelling plaintiff Christopher Lee Dunn to further respond to its first set of special interrogatories, and for monetary sanctions, came on for hearing in Department 31 of this Court on June 10, 2010, Hon. Alan S. Rosenfield presiding. Robert J. Tyson appeared on behalf of defendant City of Burbank. Solomon E. Gresen appeared on behalf of plaintiff Christopher Lee Dunn. LA MREZI-GRAPA SCRIPTOROM			
Robert J. Tyson (SBN 187311) E-mail: Tyson (Bysolaw com BURKE, WILLIAMS & SORENSEN, LLP 444 South Flower Street, Suite 2400 Los Angeles, CA 90071-2953 Tel: 213,236,0600 Pax: 213,236,2700 Attorneys for Defendant City of Burbank SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF LOS ANGELES – CENTRAL DISTRICT CHRISTOPHER LEE DUNN Plaintiff, V. BURBANK POLICE DEPARTMENT, CITY OF BURBANK, and DOES 1 Through 100, Inclusive, Defendants. Complaint filed: July 16, 2009 [PROPOSED] ORDER GRANTING MOTION: (1) TO COMPEL FURTHER RESPONSES TO SPECIAL AND FORM INTERROGATORIES AND (2) FOR MONETARY SANCTIONS AGAINST PLAINTIFF AND HIS COUNSEL The motion of defendant City of Burbank for an order compelling plaintiff Christopher Lee Dunn to further respond to its first set of special interrogatories, and for monetary sanctions, came on for hearing in Department 31 of this Court on June 10, 2010, Hon. Alan S. Rosenfield presiding. Robert J. Tyson appeared on behalf of defendant City of Burbank. Solomon E. Gresen appeared on behalf of plaintiff Christopher Lee Dunn. LA M823-6872-5765 v1 -1-			Liver's
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COUNTY OF LOS ANGELES – CENTRAL DISTRICT CHRISTOPHER LEE DUNN Plaintiff, v. BURBANK POLICE DEPARTMENT, CITY OF BURBANK, and DOES 1 Through 100, Inclusive, Defendants. Defendants. Case No. BC 417928 Assigned to the Honorable Alan S. Rosenfield,, Dept. 31 Complaint filed: July 16, 2009 [PROPOSED] ORDER GRANTING MOTION: (1) TO COMPEL FURTHER RESPONSES TO SPECIAL AND FORM INTERROGATORIES AND (2) FOR MONETARY SANCTIONS AGAINST PLAINTIFF AND HIS COUNSEL The motion of defendant City of Burbank for an order compelling plaintiff Christopher Lee Dunn to further respond to its first set of special interrogatories, and for monetary sanctions, came on for hearing in Department 31 of this Court on June 10, 2010, Hon. Alan S. Rosenfield presiding. Robert J. Tyson appeared on behalf of defendant City of Burbank. Solomon E. Gresen appeared on behalf of plaintiff Christopher Lee Dunn. LA #4R23-6872-5765 v1 -1 -	11	Ony of Duromik	•
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Sorensen, LLP	28	appeared on behalf of plaintiff Christopher Lee Dunn.	
ATTORNEYS AT LAW LOS ANGELES [PROPOSED] ORDER –INTERROGATORIES		LA #4823-6872-5765 v1 - 1 -	
		[PROPOSED] OR	DER -INTERROGATORIES

T	Having read the motion, the memoranda, the declarations, and the Separate Statement of	
2	Special Interrogatories and Form Interrogatories and Responses in Dispute, and having heard	
3	argument of counsel, and good cause appearing,	
4	IT IS HEREBY ORDERED that defendant City of Burbank's motion is granted, and that	
5	plaintiff, Christopher Lee Dunn shall prepare and serve further responses to Special	
6	Interrogatories (Set One) Nos. 7, 8, 9, 10, 11, 12, 16, 17, 18, 37, 38, 39, 61, 62, 63, 67,68, 69, 70,	
7	73, 88, 89, 90, 103 and 109 and Form Interrogatories 210.3, 210.4, 215.1 and 215.2. on or before	
8	·	
9	IT IS FURTHER ORDERED that plaintiff, Christopher Lee Dunn and his attorney Solomon	
10	E. Gresen pay monetary sanctions to defendant City of Burbank in the amount of \$	
11	on or before	
12	IT IS FURTHER ORDERED that if plaintiff is ultimately determined to be entitled to recover	
13	attorney's fees and costs from the City of Burbank in this lawsuit, the Court hereby finds that his	
14	fees and costs associated with this entire discovery dispute (meet and confer, supplementing the	
15	discovery responses, and this motion), as well as any sanctions ordered, were not reasonably	
16	incurred by him and thus not recoverable.	
17		
18	DATE:	
19	Honorable Alan S. Rosenfield	
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∕IS &t	LA #4823-6872-5765 v1 - 2 -	

Burke, Williams & Sorensen, LLP ATTORNEYS AT LAW LOS ANGELES

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PROOF OF SERVICE

I, Sandy Arangio, declare:

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I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 444 South Flower Street, Suite 2400, Los Angeles, California 90071-2953. On December 29, 2009, I served a copy of the within document(s):

PROPOSED ORDER GRANTING MOTION; (1) TO COMPEL FURTHER RESPONSES TO SPECIAL AND FORM INTERROGATORIES AND (2) FOR MONETARY SANCTIONS AGAINST PLAINTIFF AND HIS COUNSEL

by placing the document(s) listed above in a sealed envelope with postage thereon X fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below.

> Solomon E. Gresen, Esq. Law Offices of Solomon E. Gresen 15910 Ventura Blvd., Suite 1610 Encino, CA 91436

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on February 11, 2010, at Los Angeles, California.

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